

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

Sharlette McDonald

IDA B. Cannon

Defendant(s)

FILED
JAN 11 2023
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
E. ST. LOUIS OFFICE

Case Number:

3:23-CV-65-DWD
(Clerk's Office will provide)

PRO SE CIVIL RIGHTS COMPLAINT
(Non-Prisoner)

I. JURISDICTION

Subject matter jurisdiction is invoked under 28 U.S.C. § 1331, 28 U.S.C. § 1343(a)(3), and/or 42 U.S.C. § 1983. List any additional bases for federal subject matter jurisdiction here:

II. PARTIES

Plaintiff:

A. Plaintiff, a citizen of Missouri (state), who resides at 1909 Farrell Dr, alleges that his/her civil rights were violated by the individual(s) named below.

Defendant #1:

B. Defendant IDA B. Cannon is employed as GateWay Regional Hospital / Nurse / Case Manager
(a) (Name of First Defendant)
(b) (Position/Title)

with Gateway Regional Hospital
(b) (Employer's Name and Address)

2100 Madison Ave Granite City IL 62040

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☒ Yes ☐ No

If your answer is YES, briefly explain:

She Kidnapped My Mom did
 Surgeries on her Forged Documents
 She also put her NAME on my kids Birth Certificate

Check one of the following:

☒

This defendant personally participated in causing my injury, and I want money damages.

☐

The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone to something).

Defendant #2:

C.

Defendant

Felicia Phillips
(Name of Second Defendant)

is employed as

Child care
(Position/Title)

with

Childrens Home & Aid Society
(Employer's Name and Address)

2133 Johnson RD Granite City IL 62040

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain:

She crossed state line
 Telling lies as if she's my mom Betty McDonald
 Daughter when I'm the only child

Check one of the following:

☒

This defendant personally participated in causing my injury, and I want money damages.

☐

The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone to something).

Defendant #3:D. Defendant JANESIA McDONALD is employed as

(Name of Third Defendant)

Caregiver / Nurse

(Position/Title)

with

Gateway Regional Hospital / Granite City Nursing
And rehabilitation 3500 Century Dr

(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #3 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain:

She held my mother hostage and lied to Nash funeral home like she's the next kin as well. They used hospice as a cover up to where she

Check one of the following:

☒

This defendant personally participated in causing my injury, and I want money damages.

☐

The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone to something).

Additional Defendant(s) (if any):

E. Using the outline set forth above, identify any additional Defendant(s), using additional pages, if necessary.

III. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in this federal court?

☐ Yes ☒ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline.

1. Parties to previous lawsuits:

Plaintiff(s):

Sharilette McDonald on Behalf
Of Betty McDonald

Defendant(s):

IDA Cannon Mary Cannon
Joanna Richardson Felicia Phillips
JANESIA McDonald

2. Case number:

20p0579

3. Name of Judge to whom case was assigned:

Judge Cannady

4. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

Its still pending, and I
dont want the lawyer or the
Judge on the Case Because They
Let KURTAVIA white get away
with making a live video stating
She was going to slap my mom.

IV. STATEMENT OF CLAIM

State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege several related claims, number and set forth each claim in a separate paragraph.

My right was violated Because Im
Betty Ann Thompson McDonald only
Child and she gave me power of Attorney
Feb 9th 2020 Before her sisters IDA Cannon
Mary Cannon, Lakeisha Phillips Kidnapped
her. They took my mom a Missouri Resident
ON Section 8 housing in Missouri To STERNS
NURSING + Rehabilitation Nursing home. Had
Felicia Phillips Friend Cistey Robinson doing
my mothers paperwork + giving her medication
Every where they took my mom I showed
them I'm her only Child. St. Louis University
Diagnosed my mom with a stroke, only 2wks
of physical Therapy. After her 2wks Charles
Cistey NURSING told my mom 3/3/2020 locked the
doors saying Covid. They moved my mother
about 6 times Injecting her with Heparin USING
Doctors from Kurtaria White Jub at Touchette
Regional hospital. Joanna Richardson mother in law
(10/20/20)
wills for Touchette Regional Never let me see
my mom.

V. REQUEST FOR RELIEF (*check as many boxes as appropriate*)

Plaintiff requests that the court grant the following relief:

Compensatory damages in the amount of \$ 250,000.

Punitive damages in the amount of \$ 100,000.

An ordering requiring defendant(s) to:

A declaration that:

Other:

VI. JURY DEMAND (*check one box below*)

Plaintiff ☒ does or ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 1/11/2023
(date)

1909 Farrell Dr
Street Address

St. Louis MO 63133
City, State, Zip

Sharilette McDonald
Signature of Plaintiff

Sharilette McDonald
Printed Name